



Design for Improvement:

The Case for a New Accountability System

Next-Generation Accountability needs states to introduce curriculum-based interim assessments, external review of schools, and focus on continuous improvement to end the time-wasting and guesswork of a flawed school accountability system and shift SEAs from test administrators to improvement coaches.

By Mark A. Elgart, Ed.D.

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Nearly a quarter century ago, educators and policymakers came together to develop an accountability system for public education built around end-of-year state assessments that measure the extent to which students meet standards in key subject areas.

The intent was to make schools better through an approach that enabled states to rank schools and disaggregate data by race and ethnicity to reveal longstanding inequities in student performance. The belief was that this information could serve as a proxy for school quality. A standards-based, assessment-driven accountability system for what students need to know and be able to do, many believed, could help educators focus on what was most important for students to master and its high-stakes assessments could drive dramatic improvements in schools. In addition, it was believed states could play a stronger role in helping schools improve by imposing a limited range of required remedies for low-performing schools.

The results, even after NCLB was replaced by ESSA to allow for broader measures beyond assessments and locally determined strategies to strengthen schools, have taught us that the current approach to accountability will not lead to improvement. Put simply, we have seen no significant improvement in learning or school performance. In fact, one could argue that school accountability efforts have been, by and large, a missed opportunity that has short-circuited progress. The major accomplishment of our old-school accountability has been to teach us the limitations of summative assessments and to create an assessment monopoly led by a few companies that are not heavily invested in innovation.

With 20/20 hindsight, we can understand why previous accountability measures have failed.

We wanted schools to demonstrate adequate yearly progress or any progress, but end-of-year assessments lack actionable data and evidence to guide improvement during the year.

We wanted teachers to advance learning by aligning their instruction to standards, but the tests are not always aligned with what teachers were expected to teach over the course of the year.

We wanted to measure the quality of teaching, but the assessments are designed to measure student knowledge of standards, not the myriad things teachers do in classrooms to help students learn. And we thought that accountability for students who are taught the same thing at the same pace was the key to improvement. We now know that an assembly-line approach is better suited to our past industrial economy than the digital era.

We wanted students to go “all in” on the standards, but the assessment-centric approach to accountability does nothing to help students have agency in learning. Nor does that approach support greater voice and choice and crucial relationships with teachers, peers, and content relevant to their backgrounds and interests that the Science of Learning Development (SoLD) has since found to be crucial to student success.

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We wanted state education agencies to be a key partner in helping schools improve. But states continue to lack the capacity to play this role, largely focusing on whether schools are complying with desired performance targets.

And even those who had 20/20 vision could not act, because they were bound by the old rules of our nation's education system. According to Laura Slover, former CEO of CenterPoint Education Solutions and, previously, The Partnership for

Assessment of Readiness for College and Careers (PARCC), the initial design for PARCC included three interim assessments throughout the year. The through-year assessments were designed to follow a progression that would have incentivized a particular sequence of the content, which led some to believe that the assessment was dictating the curriculum. "That crossed the line—the third rail, if you will, of local control," Slover says.

The problem with relying solely on end-of-year assessments

Accountability systems today largely depend on large scale, summative assessments aligned with state standards. The primary purpose of these assessments is to classify and rank institutional performance based on the results.

Although institutions are expected to improve teaching and learning based on these results, these assessments only provide evidence at the end of the academic year, rendering them unfit to inform teacher practices during the academic year. Ranking institutional performance primarily based on a year-end summative assessment is a misuse of the purpose of assessment and neglects measures of institutional performance that determine what practices are working and what strategies need to be implemented to improve the effectiveness of a school and its educators. Assessment results are evidence that should be considered in a comprehensive evaluation of an institution but cannot be the sole instrument to evaluate an institution.

If the goal is to improve learning for every student, we must change our assessment practices and programs to administer redesigned assessments that inform and guide instruction throughout the academic year by improving teaching effectiveness and student performance.

By embedding assessments into the teaching and learning process and aligning them with the curriculum, educators can take immediate actions to improve teaching and learning. If we are truly committed to ensuring that every child is successful in their learning, then we can and must change our accountability systems to do just that.

Experts say that abandoning large-scale summative assessment in favor of curriculum-aligned testing will have significant advantages for students and teachers. For one thing, end-of-year assessments often take a week to 10 days to administer and students lose other learning time enduring many additional days of test prep prior to those days. And—in the words of Cheryl Harmon, chief academic officer of CenterPoint Education, which develops curriculum-aligned measures—assessments that are intentionally aligned with curriculum will provide timely feedback, test subject matter students have seen and allow them to demonstrate what they know in different modalities and reflect students' lived experiences. As a result, the tests are "both equitable and actionable," she says, adding:

They tell educators where to target instruction and empower students to take charge of learning, helping them know what they are working toward... So often, students will take a test and say, 'there was nothing on it that I just learned.' It is fairer for teachers and more useful for students when the tests and the test items are part of the learning cycle. When assessments are offered regularly as part of the cycle, they are not high stakes but effective learning tools. And they eliminate the "test prep mode" that teachers engage in that is really "anxiety mode" for students.

In addition, newly designed curriculum-aligned assessments can provide policymakers with the information they need for school accountability and—if done at scale—identify gaps in performance among students from different racial and ethnic backgrounds, along with cost savings for states that invest in more useful assessments that yield more promising results.

What a New Accountability System Looks Like

If the goal of accountability is to ensure that schools enable every child to meet or exceed expected levels of learning, then the **design should focus on students, teachers, and parents through periodic institutional evaluations of each school, embedded assessments that align with the curriculum in support of required standards, and support for continuous improvement efforts.**

With the student as the focal point of the design of the new accountability system, policymakers should engage with educators to drive change in three areas. Put another way, knowing what we know now, a redesigned accountability system should have three key elements:

- 1. Actionable data through curriculum-aligned, through-year assessments that can also provide a summative score.** The hardest thing to do in education is improve a school—any school. However, if we provide schools with actionable data that illustrates what practices are working, what behaviors need to change, and how best to make improvement, we can guide and assist schools to improve. Curriculum-aligned, through-year assessments break the summative assessment into multiple shorter testing periods, ensure that students are tested on what they learn, provide timely feedback to students, teachers, parents, and families, and produce for policymakers a summative score that, for the first time, can be combined with other information to provide a more accurate view of a school's quality, performance, and its efforts to improve.
- 2. Independent third-party evaluation.** Evaluation without the intent to improve schools is a waste of time, and improvement design without the benefit of evaluation is guesswork. Evaluating institutions is a complex process, but it yields critical information necessary to design and engage in improvement efforts and can propel institutions forward with a high degree of success in achieving desired improvements.

While third-party, independent school evaluations are common in numerous countries, most public institutions in this country do not take advantage of these processes. Instead, all public institutions are required to participate in accountability systems that use assessment results as a substitute for third-party evaluation.

A comprehensive, periodic third-party evaluation provides an independent, objective analysis of what an institution is doing well and what actions it must take to do better. A formal evaluation is based on standards for school improvement that describe what an effective institution does and weighs evidence—including student performance data—to identify the areas of effectiveness and improvement that need to be addressed. School evaluation can be enhanced further by analyzing the root causes of improvement needs and provide clear direction on what behaviors and practices need to change.

- 3. Focus on continuous improvement.** While institutions throughout the United States annually review, revise, and adopt school improvement plans to meet state and federal (Title 1) requirements, these efforts often fail to guide and achieve meaningful improvement. Improvement is not a compliance activity, yet most institutions develop improvement plans solely to fulfill governmental regulations. Continuous improvement is not a plan, but an embedded behavior within the culture of a school that constantly focuses on the conditions, processes, and practices that will improve teaching and learning by regularly identifying the behaviors that must be maintained and those that must change.

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Why make the change?

There are numerous reasons why states should move in this direction.

First, support from major foundations and the U.S. Department of Education has led to new efforts to develop through-year assessments that also can provide significant summative information to states that could be used for federal accountability purposes.

Education First Consulting reports that while “no fully operational through-year assessment systems have undergone federal peer review,” several states are in the process of piloting through-year models for federal accountability. The Seattle-based consulting organization notes that [thirteen states](#) administer multiple assessments during the school year as part of their summative assessment system, including Alaska, Delaware, Florida, Georgia, Indiana, Kansas, Louisiana, Maine, Montana, Nebraska, North Carolina, Texas, and Virginia.

Over the last few years, the U.S. Department of Education provided flexibility for interim assessments that include summative information as part of a three-part study funded by the Bill and Melinda Gates Foundation, the Chan Zuckerberg Initiative, and the Walton Family Foundation that CenterPoint, New Meridian, and NWEA are developing in partnership with a number of pilot states.

Both states and assessment organizations are developing new models for assessment. CenterPoint Education is currently exploring the viability of producing a summative score across the multiple administrations of interim assessments. According to Laura Slover, who is now managing director, Skills for the Future Initiative for ETS and the Carnegie Foundation for the Advancement of Teaching, such a system could combine a slimmer summative evaluation that contains comparable evidence for accountability purposes with the benefits of a district-aligned-system that provides information for teaching and learning that can be immediately used. “Imagine a system that is meaningful to both instructional improvement and state accountability,” she says. “The results will be of far greater value to educators for transforming teaching and learning.”

New Meridian’s MasteryGuide assessment program, for example, uses interim assessments to provide summative data. “Results can be aggregated to form a cumulative summative score that reflects skills demonstrated over the course of the year, providing information that can inform everything from resource allocation to the placement of additional supports,” the company notes on its website.

According to [Education First Consulting](#), [New Meridian](#) is working with Montana and Louisiana to design and pilot an innovative Instructionally Aligned Assessment System (IAAS) with short, modular assessment “testlets” in English language arts and mathematics that can align to local scope and sequences. These “testlets” can align with different scopes and sequences, and “the ultimate goal is that districts and schools will have the flexibility to administer the testlets in the order that best fits their instructional and curriculum needs,” the blog post states. “This approach allows districts to better connect assessments to learning, creating actionable and timely instructional data, while providing districts flexibility to administer the testlets in the order that works best for their scope and sequence to offer more coherence with their curriculum.” In Louisiana, New Meridian conducted a successful pilot of the Math Innovative Assessment Program with over 1,800 math students from seven school districts.

In August 2023 Montana received a federal waiver to create the Montana Alternative Student Testing (MAST) program, a through-year assessment that yields actionable data for policymakers and educators throughout Montana’s education system. Statewide use of the through-year assessment will begin in July 2024 and replace the current accountability system.

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require new approaches.”

These pilots and programs—and the growing interest among states—suggest that policymakers are ready for a new type of assessment system that provides more valuable data for schools, students, families, and state leaders.

Second, states that have adopted diagnostic school reviews have seen significant increases in the performance of their lowest-performing schools. Multiple providers, including WestED, Cognia, CenterPoint, [American Institutes of Research](#), [Insight Education Group](#), Education Resources Consortium, and others provide third-party diagnostic school review services, which focus on factors—instruction, quality of curriculum, leadership, and data on student learning—that research has shown makes a difference in student learning. For example, schools that engage with Cognia for diagnostic reviews and subsequent interventions demonstrate noteworthy rates of exiting Comprehensive Support and Improvement (CSI) status. Since 2012, Cognia has worked with 11 state departments of education to provide feedback and data on maintaining improvements.

In just three school years (2018–2022), State Education Agencies (SEAs) partnering with Cognia for diagnostic reviews of their lowest performing schools saw that:

- **40%** of schools in South Carolina were no longer identified as CSI in the following cycle
- **69%** of schools in Kentucky were no longer identified as CSI in the following cycle
- **56%** of schools were not reidentified as CSI in 2022

The results of third-party evaluations provide a rich, comprehensive understanding of the school's context and how it operates, which can give parents greater insight into the school.

Third, moving to this new accountability system creates a new role for states. The movement to new types of assessments and third-party evaluations provides state education leaders with a much more comprehensive understanding of what is happening in every school beyond just test results, including what is working, how much progress is being made, and what needs improvement.

Such a system changes the role and purpose of the SEA. While SEAs now spend an inordinate amount of time, resources, and effort to design, develop, and implement an annual testing program, in this new system, the SEA has the responsibility to clearly define expectations and direction in addition to providing support and assistance. The focus shifts to helping local education agencies (LEAs) build and strengthen their capacity and capability to improve teaching and learning. In short, the SEA moves from test administrator to improvement coach.

Fourth, new curriculum-based, periodic assessments can be paired with curriculum-based professional learning and helping educators use data for continuous improvement that can be delivered at a reasonable cost through economies of scale. Consider a state-financed “Assessment Hub” that includes curriculum-aligned assessments, along with aligned professional learning, assessment literacy supports to help educators put data to use for continuous improvement in teaching and learning. There are economies of scale that can be realized with broad engagement. “We can make curriculum-based through-year tests tied to standards that are cheaper or no more expensive than the state end-of-year assessment that has limited value,” Slover says, pointing to state hubs of services that include aligned professional learning, technical assistance, and other supports to help educators put data to use for continuous improvement in teaching and learning.

To realize these benefits, states must give districts enough flexibility to select from a menu of course-aligned assessment items that demonstrate whether students can meet standards to ensure that districts can align interim assessments with their curriculum while providing data for their accountability systems that are broader and more effective than end-of-year assessment and include comparable data for federal reporting.

Fifth and most importantly, there is an opportunity to explore a better way to measure performance that can help schools achieve goals for students and school performance that have always been elusive. These goals include closing achievement gaps and seeing schools continuously improve rather than make sporadic progress and sometimes lose ground.

Back to the Future?

In some ways we are moving “Back to the Future.” Long before summative assessments, districts combined accreditation with periodic assessments of student performance. The opportunities for developing a new accountability system will require new approaches by SEAs, districts, and third-party organizations that provide assessment and evaluation services.

Role of states in establishing new system

Perhaps the most important change of this next-generation approach to accountability will be to shift the role of the state education agency. SEAs will shift from a compliance agency that administers large-scale summative assessments and conducts evaluations of low-performing schools to a state improvement hub and district partner.

Most, if not all, state education leaders want a collaborative and cooperative relationship with the local education agencies in their state. The SEA’s role in a next-generation accountability system will establish and communicate a clear direction, make available needed resources, and provide assistance to help build the capacity and capabilities of LEAs and their schools. The SEA should provide direction, resources, and assistance to ensure that these activities are managed and conducted by the LEA in fulfillment of the direction and expectations established by the state. The SEA should identify and communicate a list of approved providers for assessment, third-party evaluation, and improvement, and ensure that all approved providers meet the rigor and expectations defined by the state and have a proven track record of effectiveness and performance. With the SEA acting as a clearinghouse, it can provide resources for each LEA and free up its own staff to partner with institutions to ensure quality and guide improvement.



The SEA should provide clear direction, needed assistance, and the necessary resources for every LEA to engage in continuous improvement.

Implementation at the district level

Curriculum-based, interim assessments for K–12 students

Under this new accountability structure, the LEA develops and implements a balanced system that includes assessment for learning—and of learning.

With a focus on the success of every learner, assessment practices should align with what is being taught in the classroom. Curriculum-based assessments given at periodic intervals should be aligned with state standards and provide, in real-time, evidence of learning that can guide instructional decisions and modifications. SEAs can exercise two options for these assessments. The SEA can provide a system of testlets that align with state standards but allow the LEA to determine when best to administer these testlets during the school year based on the scope and sequence of the local curriculum. Or the SEA can provide a list of approved entities that enables the LEA to focus on working with the assessment provider which best meets its needs and objectives. In either case, the LEA will be expected to provide the SEA with evidence of improvement of student learning. In addition, the LEA should also be accountable for the professional learning provided to teachers and teacher leaders to skillfully analyze and make instructional decisions/modifications. There cannot be an assumption that because the data reveal gaps, educators will know how to identify an issue, develop a plan, implement strategies, and evaluate student progress toward closing the gap.

This professional learning could be part of the third-party independent evaluation, SEA, or LEA requirements, but there has to be an initial and ongoing professional learning plan to prepare educators on how best to manage and apply these data that come from these more frequent and targeted assessments.

Such evidence will be key factors in the state accountability system.

Periodic third-party independent evaluations

The LEA must engage in a periodic third-party evaluation process designed to yield information with evidence of the ability of the LEA and its schools to meet criteria that define the effectiveness of an institution. The evaluation results should clearly indicate the processes and practices that are effective as well as those in need of improvement. The primary objective of the evaluation is to improve teaching and learning. As with assessments, the SEA should identify a short list of approved evaluators from which each LEA will select. The LEA must commit to a program of evaluation that will guide and inform its improvement efforts. The results of the evaluation and follow-up efforts must be shared with the SEA and be included in accountability requirements.

Ongoing, continuous improvement for all LEAs and schools

The SEA should provide clear direction, needed assistance, and the necessary resources for every LEA to engage in continuous improvement. The level of support and assistance ought to be distributed in alignment with the degree of improvement needed. LEAs must engage a SEA-approved provider that will support improvement efforts at the local level. The LEA must provide annual evidence of ongoing improvement, including student performance, teacher learning, and family engagement. Recognized progress by the LEA should be included and considered as part of meeting the state accountability requirements.



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What are the implications of such a system?

The design and expectations of such a system focus on what matters most—student learning. Although the system continues to keep an eye on assessment results, such results are embedded in the teaching and learning process so that students, teachers, and parents can benefit throughout the academic year. This use of assessments to guide teaching practices and inform student learning progress is consistent with the purpose of assessment. Currently, large-scale, summative assessments are primarily used to rank the performance of schools and make assumptions about the quality of schooling. This shift in application and design of assessments is aligned with the original vision and purpose of No Child Left Behind—to ensure that every child is successful in their learning.

Efforts to improve teaching and learning have stagnated. However, if we provide schools with timely, useful information that illustrates what practices are working, what behaviors need to change, and how best to make improvements, we can guide and assist efforts to improve. We can replace end-of-year summative assessments with interim assessment that will provide actionable information and increase instructional days. By embedding assessments into the teaching and learning process, aligned to the curriculum, immediate actions can be taken to improve teaching and learning. If we truly are committed to ensuring that every child is successful in their learning, then we can and must change our accountability systems to do just that.

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